

EXHIBIT “A”

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:	Chapter 11
MODELL'S SPORTING GOODS, INC., <i>et al.</i> ,	Case No. 20-14179 (VFP)
Debtors.	Jointly Administered
	Honorable Vincent F. Papalia

**DECLARATION OF SUSAN GERSTLE ON BEHALF OF
ATLANTIC CITY ELECTRIC COMPANY AND DELMARVA
POWER & LIGHT COMPANY IN SUPPORT OF RESPONSE OF CERTAIN
UTILITY COMPANIES TO THE ORDER TEMPORARILY SUSPENDING THE
DEBTORS' CHAPTER 11 CASES PURSUANT TO 11 U.S.C. §§ 105 AND 305**

I, Susan Gerstle, declare as follows:

1. I am a credit associate with Pepco Holdings LLC ("Pepco Holdings"), and I have been with the Pepco Holdings Credit Department for 8 years. In my current position with Pepco Holdings, I manage or participate in the management of customer and credit services, including the customer bankruptcy operations, of the following operating companies: Atlantic City Electric Company ("ACE") and Delmarva Power & Light Company ("DPL") (ACE and DPL collectively, the "Utilities").

2. Except as otherwise stated, all facts contained within this Declaration are based upon personal knowledge, my review of the Utilities' business documents, correspondence and relevant documents, or my opinion based upon my experience concerning the operations of the Utilities. If called upon to testify, I would testify to the facts set forth in this Declaration.

3. On behalf of the Utilities, I submit this Declaration in support of the *Response of Certain Utility Companies To the Order Temporarily Suspending the Debtors' Chapter 11 Cases Pursuant to 11 U.S.C. §§ 105 and 305* (the "Response").

4. In making this Declaration, I am familiar with the contents of the Response.

5. It is part of my job responsibility with Pepco Holdings to: (A) review customer accounts with the Utilities; (B) address credit issues with the Utilities' customers; and (C) address issues concerning customers that file for bankruptcy protection, including payment of post-petition invoices.

6. Attached hereto as Exhibit "A" is a chart reflecting (i) redacted post-petition account numbers, (ii) service addresses, (iii) invoice amount, (iv) invoice bill date and (v) invoice due date.

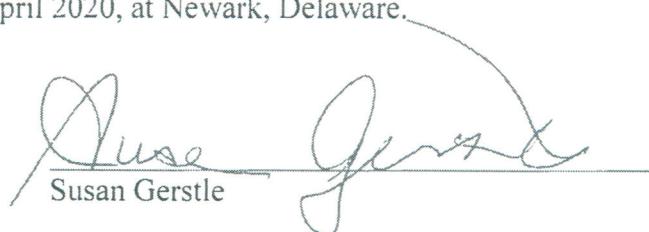
7. Exhibit "A" reflects that (i) ACE issued two post-petition invoices to the Debtors

totaling \$1,759.47, and (ii) DPL issued one post-petition invoice to the Debtors in the amount of \$563.51.

8. The Utilities have not received payment for any of the post-petition invoices set forth in Exhibit "A."

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this day of April 2020, at Newark, Delaware.



The image shows a handwritten signature in black ink. The signature consists of two parts: "Susan" on the left and "Gerstle" on the right, connected by a horizontal line. Below the signature, the name "Susan Gerstle" is printed in a smaller, sans-serif font.

Name	Address	NEW CA# (POST)	Bill date	Amount	Due Date	Paid date
MODELL'S SPORTING GOODS	1315 CHURCHMANS RD / NEWARK DE 19713	*****3198	3/24/2020	\$563.51	4/14/2019	
MODELL'S SPORTING GOODS	1315 CHURCHMANS RD / NEWARK DE 19713	*****3198				
MODELL'S SPORTING GOODS	BERLIN CIRCLE PLAZA, #4A / WEST BERLIN NJ 08091	*****3628	4/15/2020	\$1,413.02	5/7/2020	
MODELL'S SPORTING GOODS	BERLIN CIRCLE PLAZA, #5A / WEST BERLIN NJ 08091	*****3644	4/15/2020	\$346.45	5/7/2020	

<p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</p> <p>Caption in Compliance with D.N.J. LBR 9004-1(b)</p> <p>Kate R. Buck James A. Kellar McCARTER & ENGLISH, LLP 100 Mulberry Street Newark, New Jersey 07102 (973) 622-4444 kbuck@mccarter.com, jkellar@mccarter.com</p> <p><i>Counsel for NStar Electric Company, Eastern Massachusetts, Connecticut Light & Power Company, Yankee Gas Services Company, Public Service Company of New Hampshire, Consolidated Edison Company of New York, Inc., Orange and Rockland Utilities, Inc., PECO Energy Company, The Potomac Electric Power Company, Delmarva Power & Light Company, Atlantic City Electric Company, Potomac Edison Company, Jersey Central Power & Light Company, Boston Gas Company, KeySpan Energy Delivery Long Island, KeySpan Energy Delivery New York, Massachusetts Electric Company, Public Service Electric and Gas Company and Baltimore Gas and Electric Company</i></p>	<p>In re:</p> <p>MODELL'S SPORTING GOODS, INC., <i>et al.</i>, Debtors.</p>	<p>Chapter 11</p> <p>Case No. 20-14179 (VFP)</p> <p>Jointly Administered</p> <p>Honorable Vincent F. Papalia</p>
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**DECLARATION OF GAIL BUSH IN SUPPORT OF RESPONSE OF CERTAIN
UTILITY COMPANIES TO THE ORDER TEMPORARILY SUSPENDING THE
DEBTORS' CHAPTER 11 CASES PURSUANT TO 11 U.S.C. §§ 105 AND 305**

I, Gail Bush, declare as follows:

1. I am a Revenue Management Specialist for Baltimore Gas and Electric Company

("BGE") and I have been in that position for 7 years and with BGE for 12 years. In my current

position with BGE, I assist in the credit and bankruptcy operations.

2. Except as otherwise stated, all facts contained within this Declaration are based upon personal knowledge, my review of BGE's business documents, correspondence and relevant documents, or my opinion based upon my experience concerning the operations of BGE. If called upon to testify, I would testify to the facts set forth in this Declaration.

3. On behalf of BGE, I submit this Declaration in support of the *Response of Certain Utility Companies To the Order Temporarily Suspending the Debtors' Chapter 11 Cases Pursuant to 11 U.S.C. §§ 105 and 305* (the "Response").

4. In making this Declaration, I am familiar with the contents of the Response.

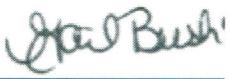
5. It is part of my job responsibility with BGE to: (A) review customer accounts with BGE; (B) address credit issues with BGE's customers; and (C) address issues concerning customers that file for bankruptcy protection, including payment of post-petition invoices.

6. Attached hereto as Exhibit "A" is a chart reflecting three (3) post-petition invoices issued by BGE to the Debtors totaling \$3,510. Exhibit "A" reflects (i) redacted post-petition account numbers, (ii) service addresses, (iii) the post-petition service period for each invoice, (iv) invoice amount, and (v) invoice due date.

7. BGE has not payment for any of the post-petition invoices set forth in Exhibit "A."

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 22nd day of April 2020, at Baltimore, Maryland.



Gail Bush

	EXHIBIT "A"					
	BG&E					
File Date:	3/11/2020					
Redacted Account Number	Premise Address	Invoice Date	Service From	Service To	Bill Amount	Due Date
*****7176	6500 Reisterstown Rd *Suite A, Balt MD 21215	4/7/2020	3/11/2020	4/7/2020	\$ 639.15	4/24/2020
*****5587	1959 E Joppa Rd, Baltimore, MD 21234	4/7/2020	3/11/2020	4/7/2020	\$ 2,458.79	4/24/2020
*****1396	160 Jennifer Rd *Store A, Annapolis, MD 21401	3/27/2020	3/11/2020	3/27/2020	\$ 412.45	4/13/2020
						No Pymts
						No Pymts
						No Pymts

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<p>In re:</p> <p>MODELL'S SPORTING GOODS, INC., <i>et al.</i>, Debtors.</p>	<p>Chapter 11</p> <p>Case No. 20-14179 (VFP)</p> <p>Jointly Administered</p> <p>Honorable Vincent F. Papalia</p>

**DECLARATION OF JOY SCAGLIONE FROM CONSOLIDATED EDISON COMPANY
OF NEW YORK, INC. IN SUPPORT OF RESPONSE OF CERTAIN
UTILITY COMPANIES TO THE ORDER TEMPORARILY SUSPENDING THE
DEBTORS' CHAPTER 11 CASES PURSUANT TO 11 U.S.C. §§ 105 AND 305**

I, Joy Scaglione declare as follows:

1. I am the Senior Customer Service Representative for Consolidated Edison Company of New York, Inc. (“Con Ed”) and have been in that position for 8 years. In my current position with Con Ed, I assist in the credit and bankruptcy operations of Con Ed.

2. Except as otherwise stated, all facts contained within this Declaration are based upon personal knowledge, my review of Con Ed’s business documents, correspondence and relevant documents, or my opinion based upon my experience concerning the operations of Con Ed. If called upon to testify, I would testify to the facts set forth in this Declaration.

3. On behalf of Con Ed, I submit this Declaration in support of the *Response of Certain Utility Companies To the Order Temporarily Suspending the Debtors’ Chapter 11 Cases Pursuant to 11 U.S.C. §§ 105 and 305* (the “Response”).

4. In making this Declaration, I am familiar with the contents of the Response.

5. It is part of my job responsibility with Con Ed to: (A) review customer accounts with Con Ed; (B) address credit issues with Con Ed’s customers; and (C) address issues concerning customers that file for bankruptcy protection, including payment of post-petition invoices.

6. Attached hereto as Exhibit “A” is a chart reflecting twenty-four (24) post-petition accounts that the Debtors have with Con Ed. Exhibit “A” reflects (i) redacted post-petition account numbers, (ii) service addresses, (iii) the meter reading date, (iv) the post-petition service period for each invoice, (v) invoice amount, and (vi) invoice due date.

7. Due to the pandemic, all indoor meter readings have been suspended, and as such, most billings on Debtor accounts with Con Ed have been delayed into May. Con Ed has issued notices stating that invoices have been delayed.

8. Exhibit "A" reflects that six invoices were issued by Con Ed to the Debtors totaling \$8,234.94.

9. Con Ed has not received a payment for any of the post-petition invoices set forth in Exhibit "A."

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 20 day of April 2020, at New York, New York.



Joy Scaglione

EXHIBIT "A"

Consolidated Edison Company

<u>MODELL'S ACCOUNTS</u>	<u>ADDRESS'S</u>	<u>READING DATE</u>	<u>NEW DATE</u>	<u>PERIODS</u>	<u>AMOUNT</u>	<u>DU DATE</u>	<u>CCG</u>
XX-XXXX-XXXX-X1005-6	34-60 48TH ST 5 STORE	4/15/2020	5/14/2020	3/11/20-05/14/20		6/9/2020	YES
XX-XXXX-XXXX-X105-4	61-17 190TH ST SWSP	3/26/2020	4/24/2020	3/11/20-3/26/20	\$704.67	5/15/2020	YES
XX-XXXX-XXXX-X002-6	2100 BARTOW AV #228	4/13/2020	5/4/2020	3/11/20-5/4/20		6/1/2020	YES
XX-XXXX-XXXX-X002-1	945 W WHITE PLAINS RD 3 STO	4/13/2020	5/12/2020	3/11/20-5/12/20		6/8/2020	YES
XX-XXXX-XXXX-X003-8	266 E. FORDHAM RD STORE	4/21/2020		3/11/20-4/21/20		5/15/2020	YES
XX-XXXX-XXXX-X003-4	270 E. FORDHAM RD STORE	4/21/2020		3/11/20-4/21/20		5/15/2020	YES
XX-XXXX-XXXX-X004-9	1500 BASSETT AVE FACTORY	4/2/2020	5/1/2020	3/11/20-5/1/20		5/28/2020	YES
XX-XXXX-XXXX-X007-9	845 3RD AVE STORE	4/6/2020	5/5/2020	3/11/20-5/5/20		6/1/2020	YES
XX-XXXX-XXXX-X001-0	607 6TH AVE STORE	4/10/2020	5/11/2020	3/11/20-5/11/20		6/5/2020	YES
XX-XXXX-XXXX-X303-8	142 W 42ND ST RETB	4/17/2020		3/11/20-4/17/20		5/13/2020	YES
XX-XXXX-XXXX-X002-1	280 BROADWAY STORE	4/27/2020		3/11/20-4/27/20		5/22/2020	YES
XX-XXXX-XXXX-X209-2	135 E 125TH ST STORE B	4/14/2020	5/13/2020	3/11/20-5/13/20		6/8/2020	YES
XX-XXXX-XXXX-X101-4	795 COLUMBUS AVE STOR 1	4/6/2020	5/5/2020	3/11/20-5/5/20		6/1/2020	YES
XX-XXXX-XXXX-X002-2	843 PELHAM BAY PW STORE	4/27/2020		3/11/20-4/27/20		5/22/2020	YES
XX-XXXX-XXXX-X102-1	459 TARRYTOWN RD STORE	4/10/2020	5/11/2020	3/11/20-4/10/20	\$303.30	5/4/2020	YES
XX-XXXX-XXXX-X006-3	162 E MAIN ST STORE	3/25/2020	4/23/2020	3/11/20-3/25/20	\$924.57	4/17/2020	YES
XX-XXXX-XXXX-X004-6	450 FULTON ST STORE	4/7/2020	5/6/2020	3/11/20-4/7/20	\$2,425.94	5/1/2020	YES

XX-XXXXX-XXXXX-X001- <u>9</u>	10 GRAHAM AVE 10 STORE	4/7/2020	5/6/2020	3/11/20-5/6/20		6/1/2020	YES
XX-XXXXX-XXXXX-X302- <u>3</u>	399 KNICKERBOCKER AV 4	4/1/2020	4/30/2020	3/11/20-4/30/20		5/22/2020	YES
XX-XXXXX-XXXXX-X903- <u>1</u>	1117 EASTERN PW 1 STORE	4/27/2020		3/11/20-4/27/20		5/21/2020	YES
XX-XXXXX-XXXXX-X009- <u>6</u>	1584 FLATBUSH AVE STORE	4/10/2020	5/11/2020	3/11/20-4/10/20	\$1,278.91	5/5/2020	YES
XX-XXXXX-XXXXX-X003- <u>9</u>	2101 CHURCH AVE 2F	4/6/2020	5/5/2020	3/11/20-4/6/20	\$2,597.55	5/1/2020	YES
XX-XXXXX-XXXXX-X002- <u>2</u>	1609 KINGS HI 3 STORE	4/28/2020		3/11/20-4/28/20		5/21/2020	YES
XX-XXXXX-XXXXX-X502- <u>6</u>	2965 VETERANS RW STO A	4/17/2020		3/11/20-4/17/20		5/11/2020	YES

DUE TO THE PANDEMIC ALL READING DATES ARE SUBJECT TO CHANGE.

<p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</p> <p>Caption in Compliance with D.N.J. LBR 9004-1(b)</p> <p>Kate R. Buck James A. Kellar McCARTER & ENGLISH, LLP 100 Mulberry Street Newark, New Jersey 07102 (973) 622-4444 kbuck@mccarter.com, jkellar@mccarter.com</p> <p><i>Counsel for NStar Electric Company, Eastern Massachusetts, Connecticut Light & Power Company, Yankee Gas Services Company, Public Service Company of New Hampshire, Consolidated Edison Company of New York, Inc., Orange and Rockland Utilities, Inc., PECO Energy Company, The Potomac Electric Power Company, Delmarva Power & Light Company, Atlantic City Electric Company, Potomac Edison Company, Jersey Central Power & Light Company, Boston Gas Company, KeySpan Energy Delivery Long Island, KeySpan Energy Delivery New York, Massachusetts Electric Company, Public Service Electric and Gas Company and Baltimore Gas and Electric Company</i></p>	
<p>In re: MODELL'S SPORTING GOODS, INC., <i>et al.</i>, Debtors.</p>	<p>Chapter 11 Case No. 20-14179 (VFP) Jointly Administered Honorable Vincent F. Papalia</p>

**DECLARATION OF JASON S. WALLACE OF JERSEY CENTRAL
POWER & LIGHT COMPANY IN SUPPORT OF RESPONSE OF CERTAIN
UTILITY COMPANIES TO THE ORDER TEMPORARILY SUSPENDING THE
DEBTORS' CHAPTER 11 CASES PURSUANT TO 11 U.S.C. §§ 105 AND 305**

I, Jason S. Wallace declare as follows:

1. I am a Manager, Revenue Operations for Jersey Central Power & Light Company (“JCP&L”) and I have been with JCP&L for 17 years. In my current position with JCP&L, I assist in the credit and bankruptcy operations.

2. Except as otherwise stated, all facts contained within this Declaration are based upon personal knowledge, my review of JCP&L’s business documents, correspondence and relevant documents, or my opinion based upon my experience concerning the operations of JCP&L. If called upon to testify, I would testify to the facts set forth in this Declaration.

3. On behalf of JCP&L, I submit this Declaration in support of the *Response of Certain Utility Companies To the Order Temporarily Suspending the Debtors’ Chapter 11 Cases Pursuant to 11 U.S.C. §§ 105 and 305* (the “Response”).

4. In making this Declaration, I am familiar with the contents of the Response.

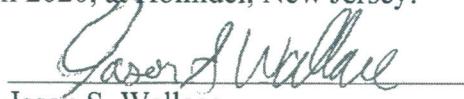
5. It is part of my job responsibility with JCP&L to: (A) review customer accounts with JCP&L; (B) address credit issues with JCP&L’s customers; and (C) address issues concerning customers that file for bankruptcy protection, including payment of post-petition invoices.

6. Attached hereto as Exhibit “A” is a chart reflecting five (5) post-petition invoices issued by JCP&L to the Debtors totaling \$2,522.10. Exhibit “A” reflects (i) redacted post-petition account numbers, (ii) service addresses, (iii) the post-petition service period for each invoice, (iv) invoice amount, and (v) invoice due date.

7. JCP&L has not received payment for any of the post-petition invoices set forth in Exhibit “A.”

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this ____ day of April 2020, at Holmdel, New Jersey.



Jason S. Wallace

EXHIBIT "A"

MODELL'S SPORTING GOODS

JCP&L

POST PETITION DEBTOR ACCOUNT SUMMARY